

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MAXINE TUCKER, *on behalf of*)
herself and those similarly situated,)
1713 Ramblewood Road)
Baltimore, Maryland 21239)

Plaintiffs,)

v.)

NATIONAL ENTERPRISE)
SYSTEMS, INC.,)
29125 Solon Road)
Solon, Ohio 44139-3442)

Defendant.)

CASE NO.:

JUDGE

CCB10CV2282

FILED
LOGGED
ENTERED
RECEIVED

AUG 19 2010

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX

NOTICE OF REMOVAL

Now comes Defendant National Enterprise Systems, Inc., pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 15 U.S.C. § 1692k, and files this Notice of Removal, and in support hereof sets forth the following grounds:

1. On or after July 23, 2010, Defendant was served with Plaintiff's Complaint, a copy of which is attached hereto, in an action entitled Maxine Tucker v. National Enterprise Systems, Inc., filed of record with the Clerk of the Circuit Court for Baltimore City, Maryland, Case No. 24-C-10-004274.
2. Plaintiff's Complaint purports to set forth a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.*, as well as a cause of action pursuant to Maryland's Consumer Debt Collection Act, Md. Code Ann. § 14-201, *et. seq.*
3. This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the Circuit Court for Baltimore City, State of Maryland, is removable to this Court.
4. Defendant will file its Answer to Plaintiff's Complaint with the Clerk of the United States District Court for the District of Maryland.

5. Copies of all process, pleadings and orders served upon Defendant National Enterprise Systems, Inc. in this action are attached hereto.
6. Thirty (30) days have not yet expired since receipt of Plaintiff's Complaint.
7. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff by ordinary mail on this date and shall also forward a Notice for filing with the Clerk of the Circuit Court for Baltimore City, State of Maryland, regarding this Notice of Removal.

WHEREFORE, Defendant prays that the above-captioned action now pending in the Circuit Court for Baltimore City, State of Maryland, be removed therefrom and placed on the regular docket of the United States District Court for the District of Maryland.


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Counsel for Defendant National Enterprise Systems, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 19, 2010, a copy of the foregoing was mailed first class, postage prepaid, to

Richard P. Seitz, Esquire
Law Office of Barry R. Glazer, P.C.
P.O. Box 27166
1010 Light Street
Baltimore, Maryland 21230


James M. Connolly